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U.S. Department of Justice

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April 9, 2021

BY ECF

Honorable Barbara C. Moses
United States Magistrate Judge
United States District Court
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: Daniel M. Boland v. Comm'r of Soc. Sec.
20 Civ. 7312 (ER) (BCM)

Dear Judge Moses:

Pursuant to the Court's February 11, 2021 order in the above-referenced Social Security case, the administrative record is due on April 13, 2021. We write respectfully to request, with the consent of plaintiff's counsel, that the time to file the record be extended for 30 days, until May 13, 2021. The reason for this request is the Social Security Administration ("SSA") needs more time to prepare the record.

In requesting this extension, we recognize that when the Court granted our second request for an extension it ordered that "no further extensions will be granted absent compelling circumstances." As explained in the enclosed declaration of Jebby Rasputnis, Executive Director of SSA's Office of Appellate Operations, SSA has faced extraordinary challenges in handling a dramatically increasing workload at the same time that it was required to redesign its business process to address changes in the workplace as a result of the pandemic. As Mr. Rasputnis explains, SSA is now producing administrative records at pre-pandemic levels, but faces a daunting backlog of cases. We have been working with SSA to expedite preparation of this record, but as of this date it has not been completed.

Application GRANTED. No further extensions will be granted. SO ORDERED.

Barbara Moses, U.S.M.J.
April 12, 2021

We appreciate the Court's consideration of this request.

Respectfully,

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United States Attorney

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Enc.

cc: Daniel A. Osborn, Esq.